

1 ADAM D.H. GRANT (State Bar No. 153271)
agrant@alpertbarr.com
2 MICHELLE E. GOODMAN (State Bar No. 238429)
mgoodman@alpertbarr.com
3 ALPERT, BARR & GRANT
A Professional Law Corporation
4 6345 Balboa Boulevard, Suite I-300
Encino, California 91316-1523
5 Telephone: (818) 881-5000
Facsimile: (818) 881-1150

6 Attorneys for Defendant,
7 DIETER P. ABT

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

10
11 TARAS VOLGEMUT, an individual,
12 Plaintiff,

13 vs.

14 DIETER P. ABT, an individual,
15 Defendant.

Case No. 2:12-cv-6678-GHK(MRWx)

**STIPULATION TO TAKE
JUDGMENT DEBTOR
EXAMINATION OF DIETER P.
ABT OFF CALENDAR**

Examination Date: July 10, 2013
Time: 9:30 a.m.
Place: Spring Street
Courthouse

Complaint Filed: August 2, 2012
Judgment Entered: November 7, 2012

16
17
18
19
20 On May 3, 2013, the Court entered an Order for Defendant/Judgment Debtor
21 Dieter P. Abt ("Abt") to Appear for Examination Re: Enforcement of Judgment
22 (Dkt. #17). The judgment debtor examination is scheduled to take place on July 10,
23 2013. However, since entry of the Order, Abt has retained counsel, and all parties
24 and their counsel are in the process of negotiating a resolution of the above-entitled
25 action.

26 As a result of the foregoing, Plaintiff/Judgment Creditor Taras Volgemut
27 ("Volgemut") hereby enters into this stipulation with Abt, by and through their
28 respective counsel, to take the judgment debtor examination of Abt off calendar.

1 The parties request that the Court take the judgment debtor examination off calendar
2 and issue an Order vacating the date for the examination and confirming that no
3 party (or counsel) is required to appear before the Court.

4 There exists good cause for taking the judgment debtor examination of Abt
5 off calendar. As discussed above, all parties and their counsel are in the process of
6 negotiating a resolution of the above-entitled action. Taking the examination off
7 calendar will promote efficiency and judicial economy, and reduce attorneys' fees
8 and costs.

9 Respectfully submitted.

10
11 DATED: July 3, 2013

ALPERT, BARR & GRANT
A Professional Law Corporation

12
13
14 By: /s/
15 ADAM D.H. GRANT
16 MICHELLE E. GOODMAN
17 Attorneys for Defendant
18 DIETER P. ABT

19 DATED: July 3, 2013

VALLE MAKOFF LLP

20
21
22 By: /s/
23 JEFFREY B. VALLE
24 JULIE J. ROBACK
25 Attorneys for Plaintiff
26 TARAS VOLGEMUT
27
28